

Christopher S. Hill (9931)
Zachary C. Lindley (17261)
KIRTON MCCONKIE
36 S. State St., Ste. 1900
Salt Lake City, UT 84111
Tel.: 801.328.3600
chill@kmclaw.com
zlindley@kmclaw.com

Attorneys for Plaintiff Richard F. Russell

Benjamin A. Blair (18853)
FAEGRE DRINKER BIDDLE & REATH LLP
300 N. Meridian St., Suite 2500
Indianapolis, IN 46204
Tel.: 317.237.0300
Benjamin.blair@faegredrinker.com

Franziska R. Mangot (admitted *pro hac vice*)
FAEGRE DRINKER BIDDLE & REATH LLP
600 Campus Drive
Florham Park, NJ 07932
Tel.: 973.549.7000
Franziska.mangot@faegredrinker.com

*Attorneys for Defendant Massachusetts Mutual
Life Insurance Company*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

RICHARD F. RUSSELL,

Plaintiff,

v.

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Defendants.

**STIPULATED MOTION TO EXTEND
DEADLINE TO SERVE INITIAL
DISCLOSURES**

Case No. 4:24-cv-00098

District Judge: Ann Marie McIff Allen
Magistrate Judge: Paul Kohler

Plaintiff Richard F. Russell (“Plaintiff”) and Defendant Massachusetts Mutual Life Insurance Company (“MassMutual”) (collectively, the “Parties”), by and through their undersigned counsel, hereby submit this Stipulated Motion to Extend Deadline to Serve Initial Disclosures. In support of this motion, the Parties state as follows:

1. On March 5, 2025, the Court entered a Scheduling Order setting the deadline for the Parties to exchange Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) as March 21, 2025. ECF No. 22. The Parties had previously agreed upon March 21, 2025 as the deadline to exchange Initial Disclosures.

2. The Parties request an additional fourteen (14) days, up to and including April 3, 2025, to exchange Fed. R. Civ. P. 26(a)(1) Initial Disclosures.

3. Good cause exists for granting this extension as the Parties require additional time to complete the Initial Disclosures and obtain client approval. The requested extension will not prejudice either party, nor will the requested extension impact any other deadlines set forth in the Court’s March 5 Scheduling Order.

Dated: March 24, 2025

/s/ Zachary C. Lindley (signed with permission)

Christopher S. Hill

Zachary C. Lindley

KIRTON MCCONKIE

Attorneys for Plaintiff Richard F. Russell

/s/ Franziska R. Mangot

Benjamin A. Blair

Franziska R. Mangot (admitted *pro hac vice*)

FAEGRE DRINKER BIDDLE & REATH LLP

Attorneys for Defendant Massachusetts Mutual Life Insurance Company

CERTIFICATE OF SERVICE

I certify that on March 24, 2025, I electronically filed the foregoing, **STIPULATED MOTION TO EXTEND TIME SERVE INITIAL DISCLOSURES**, using the court's CM/ECF system, which provides a copy to the following:

Christopher S. Hill (9931)
Zachary C. Lindley (17261)
KIRTON MCCONKIE
36 S. State St., Ste. 1900
Salt Lake City, UT 84111
Tel.: 801.328.3600
chill@kmclaw.com
zlindley@kmclaw.com

/s/ Franziska R. Mangot
Franziska R. Mangot (admitted *pro hac vice*)